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8 Attorneys for Plaintiff Sony Corporation

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10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA  
12

13 SONY CORPORATION,

14 Plaintiff,

15 v.

16 VIZIO, INC.,

17 Defendant.  
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CASE NO. CV 08-01135-RGK (FMOx)

**DISCOVERY MATTER**

**DECLARATION OF HEATHER E.  
BELVILLE IN SUPPORT OF SONY'S  
PORTION OF JOINT STIPULATION  
REGARDING VIZIO INC.'S MOTION TO  
COMPEL EXPERT REPORTS AND  
DEPOSITIONS, AND TO COMPEL  
DEPOSITIONS OF SONY WITNESSES IN  
THE UNITED STATES**

**Magistrate Judge: Hon. Fernando M. Olguin**

**Discovery Cut-Off Date:** November 1, 2009

**Pretrial Conference Date:** January 10, 2010

**Trial Date:** January 26, 2010

1           1.       I am an associate with the law firm of Quinn Emanuel Urquhart Oliver  
2 & Hedges, LLP, counsel for Sony Corporation ("Sony"). I submit this declaration  
3 in support of Sony's portion of the parties' JOINT STIPULATION REGARDING  
4 VIZIO INC.'S MOTION TO COMPEL EXPERT REPORTS AND DEPOSITIONS,  
5 AND TO COMPEL DEPOSITIONS OF SONY WITNESSES IN THE UNITED  
6 STATES. I have personal knowledge of the facts stated in this declaration, and if  
7 called upon to do so, could and would competently testify thereto.

8           2.       Sony and Vizio's discussions on February 27, 2009 and on March 12,  
9 2009 were telephone conversations.

10          3.       Sony and Vizio's discussions on February 27, 2009 and on March 12,  
11 2009 were in the context of the preparation of the parties' Rule 26(f) Report.

12          4.       Vizio did not provide Sony with a Rule 37-1 letter prior to the parties'  
13 discussions on February 27, 2009 or on March 12, 2009.

14          5.       The parties did not meet in person pursuant to Local Rule 37-1 to  
15 discuss the location of depositions.

16          6.       Vizio did not send Sony a Local Rule 37-1 letter requesting an in-  
17 person meet-and-confer regarding the location of depositions.

18          7.       On Friday, July 31, 2009, I called Vizio's counsel and offered to work  
19 with him to book time at the U.S. Consulate in Japan. To date, neither he nor  
20 anyone else from Vizio has responded to that request.

21          8.       Counsel for Sony and Vizio have offices within the same county in the  
22 Central District of California.

23          9.       Vizio's portion of the joint stipulation does not identify any discussions  
24 between the parties concerning the location of depositions for foreign witnesses that  
25 took place after March 12, 2009 and prior to Vizio's service of its portion of the joint  
26 stipulation, and I am not aware of any such discussions having taken place.

27          10.       Sony is willing to make its Rule 30(b)(6) witnesses available for  
28 deposition in the United States.

1  
2 11. The Sony senior manager who attended the Early Neutral Evaluation  
3 and Scheduling Conference in *Sony Corp. v. Vizio, Inc.*, Case No. 09-cv-01043-  
4 LAB-BLM (S.D. Cal.) is not among those Sony employees noticed for a deposition.

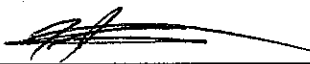
5 12. Attached hereto as Exhibit A is a true and correct copy of a letter from  
6 Ryan B. McCrum to Peter Klivans, dated July 29, 2009.

7 13. Attached hereto as Exhibit B is a true and correct copy of a document  
8 produced in this case bearing production numbers V0000019846-870.

9 14. Attached hereto as Exhibit C is a true and correct copy of a document  
10 produced in this case bearing production numbers V0000046722-735.

11  
12 I declare under penalty of perjury under the laws of the State of California  
13 and the United States of America that the foregoing is true and correct.

14  
15 Executed on August 12, 2009 in Redwood Shores, California.

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